

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIV.**

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311
Honorable Marianne O. Battani

In Re: Wire Harness	2:12-cv-00103
In Re: Instrument Panel Clusters	2:12-cv-00203
In Re: Fuel Senders	2:12-cv-00303
In Re: Heater Control Panels	2:12-cv-00403
In Re: Bearings	2:12-cv-00503
In Re: Alternators	2:13-cv-00703
In Re: Anti-Vibrational Rubber Parts	2:13-cv-00803
In Re: Windshield Wiper Systems	2:13-cv-00903
In Re: Radiators	2:13-cv-01003
In Re: Starters	2:13-cv-01103
In Re: Ignition Coils	2:13-cv-01403
In Re: Motor Generator	2:13-cv-01503
In Re: HID Ballasts	2:13-cv-01703
In Re: Inverters	2:13-cv-01803
In Re: Elec. Powered Steering Assemblies	2:13-cv-01903
In Re: Fan Motors	2:13-cv-02103
In Re: Fuel Injection Systems	2:13-cv-02203
In Re: Power Window Motors	2:13-cv-02303
In Re: Auto. Transmission Fluid Warmers	2:13-cv-02403
In Re: Valve Timing Control Devices	2:13-cv-02503
In Re: Electronic Throttle Bodies	2:13-cv-02603
In Re: Air Conditioning Systems	2:13-cv-02703
In Re: Windshield Washer Systems	2:13-cv-02803
In Re: Spark Plugs	2:15-cv-03003
In Re: Automotive Hoses	2:15-cv-03203
In Re: Ceramic Substrates	2:16-cv-03803
In Re: Power Window Switches	2:16-cv-03903

THIS DOCUMENT RELATES TO:

End-Payor Actions

**OBJECTOR MARK RAY AND SEAN HULL'S MOTION FOR LEAVE TO
FILE REPLY AND SUPPORTING BRIEF**

Class members and objectors Mark Ray and Sean Hull respectfully move, based on good cause, for leave of Court to file, out of time, their Reply to class counsels' Omnibus Response to Objections. Objectors rely on the reasons set forth in the attached supporting brief.

Dated: April 18, 2017

Respectfully submitted,

/s/ Christopher A. Bandas

Christopher A. Bandas

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*Attorney for Objectors Mark Ray and
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Brief in Support of Motion for Leave to File Reply

Class counsel filed their Omnibus Response to Objections to Round 2 Settlements on April 5, 2017 in Case No. 2:13-cv-01803-MOB, ECF Doc. 134. Because the Response was not filed in Master File No. 12-md-02311, counsel for Objectors Ray and Hull was unaware of the Response until after the deadline for filing a reply. Of note, the class notice refers to “[t]his litigation . . . as In re Automotive Parts Antitrust Litigation, MDL No. 2311.”

Because the Omnibus Response misunderstands and distorts several of Objectors Ray and Hull’s arguments, and because it submits distracting *ad hominem* attacks on their counsel, there is good cause for this Court to grant leave to file an out-of-time Reply to the Omnibus Response. Objectors Ray and Hull respectfully request, based on good cause and to assist the Court in ruling on these issues, that they be granted leave to file the Reply attached hereto as Exhibit 1.

Counsel for Objectors attempted to make reasonable efforts to ascertain whether the motion is opposed, but as of the filing of this motion, was unable to conduct a conference. Counsel was unaware of the Omnibus Response until the last hour, and thus was not able to send correspondence to opposing counsel until the date of filing. As of the filing of the motion, he has received no response from counsel.

Dated: April 18, 2017

Respectfully submitted,

/s/ Christopher A. Bandas

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*Attorney for Objectors Mark Ray and
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Certificate of Service

The undersigned certifies that today he filed the foregoing motion, brief, and exhibit on ECF which will send electronic notification to all attorneys registered for ECF-filing.

Dated: April 18, 2017

/s/ Christopher A. Bandas

Christopher A. Bandas